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5 **UNITED STATES DISTRICT COURT**
6 **FOR THE WESTERN DISTRICT OF WASHINGTON**

7 ANTOINE TOFFA.

8 Plaintiff,

Case No.: 17-CV-01608-RSM

9 v.

10 **CONSENT JUDGMENT**

11 RYAN EDLIN aka RYAN EDIN,

12 Defendant.

13
14 Plaintiff Antoine Toffa, by and through his attorneys Revision Legal, PLLC and
15 Ranallo Law Office, and Defendant Ryan Edin, stipulate and agree as follows:

- 16 1. On October 28, 2017, Plaintiff filed his Complaint against a John Doe defendant
17 asserting a violation of the Computer Fraud and Abuse Act, 18 U.S.C. § 1030,
18 Conversion, Intentional Interference with Contractual Rights, and seeking Declaratory
19 Relief regarding Defendant's actions to unlawfully obtain possession and control over
20 Plaintiff's <opinions.com>, <brands.com>, <companies.com>, and <polls.com>
21 domain names (collectively referred to as the "Domain Names").
22
23 2. The Defendant, now the registrant of the Domain Names as listed in the public WHOIS
24 records, used a privacy protection service called WHOIS GUARD, INC. to shield his
25 personal details from public view.
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27
28

- 1 3. On October 29, 2017, Plaintiff's counsel provided WHOIS GUARD, INC. a court-
2 stamped copy of the Complaint and demanded it drop the privacy protection on the
3 Domain Names' public WHOIS records.
- 4 4. On October 29, 2017, Plaintiff's counsel provided a court-stamped copy of the
5 Complaint to domain name registrar eNom, Inc., located within this judicial district, and
6 requested the Domain Names be locked from further transfer.
- 7 5. On October 30, 2017, eNom sent the registrant of the Domain Names an email
8 informing him this lawsuit had been filed and that eNom was placing a lock on the
9 Domain Names. eNom sent that email the following email addresses:
10
11 A3B7AB1CDB6747608C92894CF8859B3B.PROTECT@WHOISGUARD.COM,
12 6C86F6E864F64D9A8363A78D1FEE7937.PROTECT@WHOISGUARD.COM,
13 25CFDF4732B641C8AA2DB12F2813E735.PROTECT@WHOISGUARD.COM, and
14 F606B2737A9B442795EB4A87C97543A3.PROTECT@WHOISGUARD.COM.
15
- 16 6. On October 31, 2017, WHOIS GUARD, INC. responded to Plaintiff's counsel and
17 provided the following WHOIS information for <brands.com>
18
19 Name: Ryan Edin
20 Address: 2 Willow Glen, Branton, Doncaster
21 South Yorkshire, DN3 3JD
22 GB
23 Phone: +44.7939901233
24 Email: ryanedlin@outlook.com
25
- 26 7. On or about October 31, 2017, the registrant of the Domain Names emailed the
27 Plaintiff and stated that he was willing to return the Domain Names to Plaintiff's
28 possession.
8. The current registrant of the Domain Names is Ryan Edlin.

- 1 9. Ryan Edlin admits the WHOIS information provided in ¶ 6 above contains an inaccurate
2 spelling of his last name.
- 3 10. Ryan Edlin acknowledges receipt of Plaintiff's Complaint.
- 4 11. Ryan Edlin hereby waives any requirement of service of the Complaint, consents to being
5 named as the Defendant in this matter in substitution for the "John Doe" Defendant, and
6 consents to receive all further documents in connection with this matter at the address in
7 ¶ 6 above.
8
- 9 12. The parties agree that the Court has subject-matter and personal jurisdiction over
10 Defendant Edlin, and that venue properly lies in the United States District Court for the
11 Western District of Washington.
12
- 13 13. Without admitting liability, Defendant Edlin wishes to resolve this matter and consents
14 to entry of judgment in the above-captioned case consistent with this Consent Judgment.
15
- 16 14. The parties agree to entry of this Consent Judgment without contest.
- 17 15. Defendant Edlin has notice of and understands the provisions of this Consent Judgment.
- 18 16. Defendant Edlin agrees that Plaintiff is the rightful owner of the Domain Names.
- 19 17. Defendant Edlin consents to this Court entering an order requiring the registrar of record,
20 eNom, Inc., to take necessary actions to transfer <opinions.com>, <brands.com>,
21 <companies.com>, and <polls.com> into Plaintiff's full and final possession.
22
- 23 18. Defendant Edlin agrees to provide any and all assistance or cooperation necessary to
24 effectuate the transfer of <opinions.com>, <brands.com>, <companies.com>, and
25 <polls.com> into Plaintiff's full and final possession
- 26 19. The parties waive the right to appeal from this judgment and will bear their respective
27 costs, including attorney fees, incurred in connection with this litigation.
28

20. The items above are true and represent the agreement reached between the parties.

PLAINTIFF

/s/ Eric Misterovich

Eric Misterovich (P73422)

Pro Hac Vice Granted (ECF No. 3)

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DEFENDANT

Ryan Edlin

2 Willow Glen, Branton, Doncaster

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+44.7939901233


ryanedlin@outlook.com

Therefore, upon motion of the parties, and for cause shown,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. That Plaintiff is the rightful owner of <opinions.com>, <brands.com>, <companies.com>, and <polls.com>;
2. That the registrar of record, eNom, Inc., shall take any and all necessary actions to transfer <opinions.com>, <brands.com>, <companies.com>, and <polls.com> into Plaintiff's full and final possession;
3. That Defendant Edlin shall comply and provide any and all assistance or cooperation necessary to effectuate the transfer of <opinions.com>, <brands.com>, <companies.com>, and <polls.com> into Plaintiff's full and final possession;
4. That each part shall bear all fees and other expenses, including attorney fees, incurred by such party in connection with any stage of this proceeding;
5. That this Court shall retain jurisdiction for purposes of enforcing compliance with the terms of this Consent Judgment; and
6. This matter is now CLOSED.

Dated this 12th day of December, 2017.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Nicholas Ranallo

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/s/ Eric Misterovich

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